

I, Christopher Destito, being duly sworn, depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”), and have been since 1997. I was assigned to the Drug Enforcement Administration (DEA), Vermont Drug Task Force, Burlington, Vermont Office, from 1999 to 2001 where I was responsible for complex drug distribution investigations. I have extensive experience investigating drug crimes.
2. The purpose of this affidavit is to establish probable cause to conclude that Justin Stone, 24, and Corrin Laraway, 22, both of Bristol, have violated 21 U.S.C. § 856 by knowingly and intentionally making their apartment, apartment 1, 51 Woodland Drive, in Bristol, Vermont, available for use for the purpose of unlawfully storing and distributing heroin, a schedule I controlled substance.
3. The information presented below is based on information observed by me personally, and conveyed to me by officers of the Vermont State Police (“VSP”) with knowledge of this investigation, including members of the Vermont Drug Task Force, as well as my review of a report VSP Det. Sgt. Julie Scribner (Det. Sgt. Scribner has advised me she believes the information to be accurate).

4. Shortly before 2am on March 19, 2016, a resident of the apartment complex located at 51 Woodland Drive in Bristol called VSP to report a disturbance and the sound of fighting from a neighbor's residence located at apartment 1, 51 Woodland Drive, in Bristol, Vermont. VSP personnel have advised me that the building manager for this structure has confirmed that both STONE and LARAWAY are the tenants of this apartment pursuant to a signed lease agreement.
5. VSP Sgt. Matt Daley responded to the scene at approximately 2am. The original complainant advised Sgt. Daley that STONE and LARAWAY had just returned to their apartment. Sgt. Daley observed wounds on STONE's face. STONE and LARAWAY advised Sgt. Daley that they had just returned from Porter Hospital, where they sought treatment for STONE, and that STONE had been injured in a slip-and-fall in the shower. Both STONE and LARAWAY advised there had been no domestic assault, that both felt safe, and there were no issues. They further stated they intended to leave the apartment to travel to one of their mother's residence. Sgt. Daley then left the premises.
6. Shortly before 3am, a 911 caller reported that a friend had been shot and that his friend had been staying at 51 Woodland Drive in Bristol. The 911 caller provided a phone number for his friend. Shortly thereafter, 911 received a

call from the phone number that the first caller had advised belonged to his friend. This caller stated he had been kidnapped and stabbed. The 911 system determined that this caller was located in the vicinity of Notch Road, in Lincoln, Vermont.

7. In light of the 911 calls, VSP Sgt. Daley and Tpr. Flansburg returned to the apartment at 51 Woodland Drive. They observed what they believed was blood soaking the doormat in front of Apartment 1, and blood stains on the stairs leading to the apartment. Out of concern that an injured person could be within the apartment, they forced entry. They found no one inside. But while clearing the residence, they observed heroin baggies and syringe needles, overturned furniture, bloody clothing or towels, firearms, and a glass candle jar with blood on it. Sgt. Daley and Tpr. Flansburg then secured the residence in order for VSP to apply for a search warrant.
8. Shortly before 330am, Bristol Rescue and Lincoln Fire Department located a person later identified as Cody Toledo on the side of Notch Road, in Lincoln, the area where the 911 system determined the above-referenced 911 call came from. Toledo was taken to the hospital for treatment of injuries. I have been advised by VSP personnel with knowledge that while Toledo was injured, he was neither shot nor stabbed.

9. After not finding STONE and LARAWAY at the previously-indicated mother's residence, a BOL (be on lookout) was issued for their vehicle.
10. Shortly before 6am, Colchester Police observed a car registered to STONE parked near Motel 6 in Colchester. They observed what appeared to be blood on one of the vehicle's door handles. Colchester Officers located STONE and LARAWAY in Room 115 and took them into custody for further investigation.
11. Both STONE and LARAWAY were advised of their *Miranda* rights and agreed to speak with police. They were interviewed apart from each other. Both STONE and LARAWAY admitted that for at least the previous month they permitted a man they referred to as "John" to stay in their apartment for purposes of John's heroin distribution operation. They further admitted they received payment for doing so. They further admitted that the previous night they drove "John" to Notch Road in Lincoln, and left him on the side of the road. What role STONE and LARAWAY played in the condition of Cody Toledo remains under investigation.
12. STONE also stated that before they travelled to the Motel 6 in Colchester they retrieved money and heroin from their apartment at 51 Woodland Drive to bring with them to the motel. A subsequent search of room 115 at the Colchester motel revealed several thousands of dollars of U.S. currency, as


well as what has been described to me as a “golf ball-sized” quantity of heroin (a portion of which was field-tested by VSP with a positive result for heroin). I know based on my training and experience that such a quantity of heroin indicates that it is possessed for purposes of re-distribution.

Dated at South Burlington in the District of Vermont on this 20th day of March, 2016.



CHRISTOPHER DESTITO, FBI SA

Sworn to and subscribed before me this 20th day of March, 2016.



JOHN M. CONROY
UNITED STATES MAGISTRATE JUDGE